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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**[PROPOSED] ORDER GRANTING GOOGLE  
LLC'S MOTION IN LIMINE RE  
PLAINTIFFS' IMPROPER DEMONSTRATIVES  
AND ARGUMENT ON ACTUAL DAMAGES**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 Before the Court is Google LLC's ("Google") Motion *in Limine* Re Plaintiffs' Improper  
2 Demonstratives and Argument on Actual Damages (the "Motion"). Having considered Motion,  
3 the Declaration of Eduardo E. Santacana filed concurrently therewith, and the exhibits attached  
4 thereto, along with other materials in the record, argument of counsel, and such other matters as the  
5 Court may consider, the Court GRANTS the Motion.

6 Accordingly, IT IS HEREBY ORDERED THAT:

7 Google's Motion *in Limine* Re Plaintiffs' Improper Demonstratives and Argument on  
8 Actual Damages is GRANTED. Plaintiffs are precluded from inviting the jury to employ a  
9 damages model that multiplies the number of class member devices by both a \$3 payment and then  
10 some number of months.

11  
12 **IT IS SO ORDERED.**

13  
14 Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. RICHARD SEEBORG  
United States District Judge